Bergey, et al v. Boy Scouts of Amer Doc. 26

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEW MEXICO**

LINDA BERGEY and JAMES R. BERGEY, SR.,

Plaintiffs,

vs. No. CIV-05-0536 MCA/WPL

BOY SCOUTS OF AMERICA
d/b/a PHILMONT SCOUT RANCH BSA,

Defendant.

**MOTION TO EXTEND DEADLINE TO SERVE DISPOSITIVE MOTIONS**

Defendant, Boy Scouts of America, by and through its attorneys of record, Butt Thornton & Baehr PC, with the concurrence of counsel for the Plaintiffs, Patrick A. Casey, hereby moves the Court for an Order extending the time in which to service dispositive Motions from April 14 until May 12, 2006. No other deadlines to be affected. In support of this Motion, the parties would show the Court the following:

1. The parties and their counsel have been cooperative in attempting to move this case forward in a timely fashion to resolution.

2. The depositions of all expert witnesses have been completed, but only some of the necessary fact witnesses have been completed.

3. Pursuant to a status conference with the Honorable William P. Lynch, United States Magistrate Judge, the discovery deadline in this case has been extended to April 28, 2006.

4. Neither party expects to file any Motions related to discovery.

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5. Some fact witness' depositions will be completed after the current dispositive Motions deadline of April 14, 2006 and may raise questions of undisputed facts to be included in the dispositive Motions.

6. The parties have arranged for a private mediation of this matter on June 28, 2006.

WHEREFORE, it is respectfully requested that the deadline for service of dispositive Motions be extended to May 12, 2006, all other deadlines previously set by the Court remain in effect.

BUTT THORNTON & BAEHR PC

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I hereby certify that I have mailed a true copy of the foregoing pleading to all counsel of record this 29th day of March, 2006:

Patrick A. Casey, Esq.
Patrick A. Casey, PA
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Alfred L. Green, Jr.